

UNITED STATES DISTRICT COURT

for the

Eastern District of Wisconsin

United States of America
v.
Antwuan D. Pugh, XX/XX/1993

Case No.

18-M-141

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 1, 2015 to the present in the county of Milwaukee in the
Eastern District of Wisconsin, the defendant(s) violated:

Code Section

Offense Description

Title 18, United States Code, Section 922(g)(3)	(possessing firearms or ammunition as an unlawful user of a controlled substance),
Title 18, United States Code, Section 922(d)(1)	selling or disposing of any firearm or ammunition to a known felon),
Title 18 United States Code, Section 922(a)(1)	(dealing firearms without a license),
and Title 21, United States Code, Section 841(a)(1)	and (distribution of a controlled substance)

This criminal complaint is based on these facts:

See the attached.

☒ Continued on the attached sheet.


Complainant's signature

Richard Connors, ATF Agent

Printed name and title

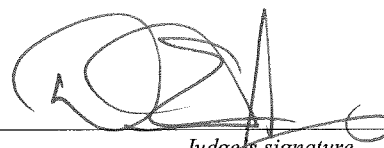
Sworn to before me and signed in my presence.

Date:

Aug. 21, 2018

City and state:

Milwaukee, Wisconsin



Judge's signature

Honorable David E. Jones

Printed name and title

**AFFIDAVIT IN SUPPORT OF SEARCH WARRANTS
AND CRIMINAL COMPLAINT**

I, **Richard Connors**, being first duly sworn, hereby depose and state as follows:

I. AGENT BACKGROUND AND INFORMATION

1. I make this affidavit in support of an application under Rule 41 of the Federal Rules of Criminal Procedure for a search warrant authorizing the examination of property, a residential dwelling, and the extraction from that property of evidence described in Attachment B.

2. I am employed as a Special Agent with the United States Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) assigned to the Milwaukee Field Office since October of 2015. I have been employed as a full time law enforcement officer for over 2 and a half years. I have received training at the Federal Law Enforcement Training Center in Glynco, GA. I attended the Criminal Investigator Training Program, as well as ATF's Special Agent Training Program. I have received training in the investigation of unlawful possession of firearms, the unlawful transfer of firearms, and the unlawful dealing in firearms without a dealers' license. Prior to becoming a Special Agent with the ATF, I received two (2) bachelor's degrees from Northern Illinois University in the fields of Sociology and International Relations. I have received a Master's degree from Northern Illinois University in the field of American Government.

3. I have received training in the investigation of firearms trafficking, and I work alongside several senior ATF agents who have worked extensive firearms trafficking investigations

in the past. Based on my training, experience, and participation in firearms trafficking investigations,

I know and/or have observed the following:

- a. I have utilized informants to investigate firearms and drug trafficking. Through informant interviews and debriefings of individuals involved in firearms and narcotics trafficking, I have learned about the manner in which individuals and organizations distribute both in Wisconsin;
- b. I have also relied on informants to obtain firearms and drugs from individuals on the streets (as opposed to licensed gun dealers), known as a controlled purchase;
- c. I have experience conducting street surveillance of individuals engaged in firearms and drug trafficking. I have participated in the execution of numerous search warrants where narcotics, firearms, ammunition, magazines, and firearms cases have been seized;
- d. I am familiar with the language utilized over the telephone to discuss firearms and drug trafficking, and know that the language is often limited, guarded, and coded;
- e. I know that firearms and drug traffickers often use electronic equipment, wireless and land-line telephones, and pagers to conduct firearms trafficking operations;
- f. I know that drug traffickers commonly have in their possession, and at their residences and other locations where they exercise dominion and control, firearms, ammunition, and records or receipts pertaining to such;
- g. I know that firearms and drug traffickers often put their telephones in nominee names to distance themselves from telephones that are utilized to facilitate firearms trafficking;
- h. I know that firearms and drug traffickers often use proceeds to purchase assets such as vehicles, property, jewelry, and narcotics. I also know that firearms and drug traffickers often use nominees to purchase and/or title these assets to avoid scrutiny from law enforcement officials; and
- i. I know that firearms traffickers often use online firearms brokerage websites, such as "Armslist," to obtain firearms. I know that individuals who utilize "Armslist," will contact other users of the site regarding the sale of firearms via electronic mail (hereinafter referred to as EMAIL) and exchange phone numbers. Individuals then discuss price and meet up locations to exchange money for the firearms by phone. Individuals are not required to complete background checks through "Armslist," and

individuals often do not check to see if the person to whom they are transferring the firearm is a convicted felon.

4. I have participated in several firearms and drug trafficking investigations that involved the seizure of computers, cellular phones, cameras, and other digital storage devices, and the subsequent analysis of electronic data stored within these computers, cellular phones, cameras, and other digital storage devices. On many occasions, this electronic data has provided evidence of the crimes being investigated and corroborated information already known or suspected by law enforcement.

5. I have participated in several firearms and drug trafficking investigations that involved the use of social media as a means of communication for the individuals involved in firearms trafficking. Social media allows the user to send and receive pictures/text messages/audio calls, etc. in order to facilitate their transactions.

6. The facts in this affidavit come from my personal observations, my training and experience, information obtained from witnesses, and information obtained from other agents during the course of their official duties, all of whom I believe to be truthful and reliable. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

7. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that violations of Title 18, United States Code, Section 922(g)(3) (possessing firearms or ammunition as an unlawful user of or as an addict to any controlled substance), Title 18, United States Code, Section 922(g)(1) (possessing firearms or ammunition as a convicted felon), Title 18, United States Code, Section 922(d)(1) (selling or

disposing of any firearm or ammunition to a known felon), and Title 18 United States Code, Section 922(a)(1) (dealing firearms without a license) and Title 21, United States Code, Section 841(a)(1) (distribution of a controlled substance) have been committed by Antwuan D. Pugh and his brother Kenyon Q. Pugh. Finally, there is also probable cause to search the information described in Attachment A for evidence of these as described in Attachment B.

II. PROPERTY TO BE SEARCHED AND PERSON TO BE ARRESTED

8. This affidavit is made in support of an application for a warrant to search the residence of Antwaun PUGH located at 82[REDACTED] N. 107th St., Apt. # [REDACTED], Milwaukee, WI, 53224, to include all basement and garage type areas controlled by Antwaun PUGH as well as all vehicles tied to the property. The structure lies within the Park Club apartment complex. The structure is half brick, half white wood with a blue exterior door. Directly to the right of the exterior door to PUGH's structure are the numbers "82[REDACTED]."

9. This affidavit is also made in support of application for a warrant to search the residence of Kenyon PUGH located at 39[REDACTED] W. Good Hope Rd., Apt. [REDACTED], Milwaukee, WI, 53209, to include all basement and garage type areas controlled by Kenyon PUGH along with all vehicles controlled by the inhabitants of 39[REDACTED] W. Good Hope Rd., Apt. # [REDACTED] Milwaukee, WI, 53209. The apartment lies within a red brick multi unit building. The numbers "39[REDACTED]" appear above a glass door that faces W. Good Hope Road.

10. The applied for warrant would authorize the search and recovery of evidence particularly described in attachment B.

11. Based upon the foregoing, I also believe probable cause exists to arrest Antwaun D. Pugh for the aforementioned violations.

III. PROBABLE CAUSE

A. Vehicle Stop of Antwuan PUGH and Search Warrant at the PUGH Residence

12. On December 1, 2015, City of Milwaukee Police Department officers (MPD) conducted a traffic stop of a 2000 black Lincoln town car, bearing state of Wisconsin license plate 922-XXN. Antwuan PUGH (DOB XX/XX/1993) was driving the aforementioned vehicle, which was registered to his mother. During a search of the vehicle, MPD recovered 0.7 grams of green leafy substance that field tested positive for THC, the active ingredient in marijuana. Also recovered from Antwuan PUGH's person was a White Samsung touchscreen cell phone, model number SM-G360T1. Shortly after the traffic stop, MPD executed a search warrant at 81 [REDACTED] N. Granville Road, Milwaukee, WI, 53224.

13. On December 1, 2015, upon his arrest, Antwuan PUGH gave a recorded statement after being read his Miranda rights which PUGH understood and agreed to waive. Antwaun PUGH stated he always smokes marijuana when he feels in a "chill" mood. Antwuan PUGH stated he was arrested after officers located a bag of marijuana in his vehicle. Antwuan PUGH further stated that his brother, Kenyon PUGH, has access to his bedroom at the residence on N. Granville Road and would utilize it to change clothing and occasionally leave personal items.

14. Law enforcement believes Antwuan PUGH and his older brother, Kenyon PUGH (DOB XX/XX/1986) resided at 81 [REDACTED] N. Granville Road, Milwaukee, WI on December 1, 2015. Agents had conducted surveillance at the residence, and observed Antwuan PUGH exiting in and

out of the residence on several occasions, and entering and exiting a 2000 black Lincoln town car, bearing state of Wisconsin license plate 922-XXN.

15. Officers searched the bedroom believed to be shared by Antwuan and Kenyon PUGH, and recovered the following: (1) paper identifiers for Kenyon PUGH, along with an envelope marked “Tweezy,” a known nickname for Antwuan PUGH; (2) 1.9 grams of green leafy plant like substance which field tested positive for the presence of THC; (3) two firearms: an Armscor of the Philippines handgun, model M1911-A1-FS, .45 caliber, bearing serial number RIA1686424; and a Glock handgun, model 21, .45 caliber, bearing serial number TNY752. Law enforcement located several assorted brands and calibers of ammunition and several different magazines for firearms throughout the house. Additionally, law enforcement located the following empty gun boxes in the residence: Glock handgun boxs, model 23, .40 caliber, bearing serial numbers MHZ778, MHT876, PVL502; Glock handgun box, model 21, .45 caliber, bearing serial number TNY752; Glock handgun box, model 22c, .40 caliber, bearing serial number GHU315; one black plastic Intratec, 9mm, firearms case; one black plastic firearms case for a Armscor of the Philippines handgun, model M1911-A1-FS, .45 caliber, bearing serial number RIA1686424; one plastic black Plano firearms case; and one black cardboard Bersa handgun box for a model Thunder 45, .45 caliber, bearing serial number SG2977.

16. Antwuan PUGH has never been convicted of a felony offense.

B. The Pugh Brothers’ Involvement with Firearms

17. On December 6, 2014, [REDACTED] sold a Glock handgun, model 33, .45 caliber, bearing serial number XEH452, to Antwuan PUGH for \$500. Mr. [REDACTED] located the firearm bill of sale and provided a copy to affiant. On the bill of sale form underneath the

“buyer” section, Antwuan PUGH filled in his contact information with an address of 8142 N. Granville Road. Mr. [REDACTED] indicated that he was contacted via “Armslist” for the purchase of the firearm. Mr. [REDACTED] stated that after contacting the individual via “Armslist,” he exchanged phone numbers with the potential buyer, and the two then began exchanging phone calls and text messages. The number that Mr. [REDACTED] utilized was 414-216-[REDACTED]. Mr. [REDACTED] stated that Antwuan PUGH utilized the telephone number 414-233-[REDACTED] for the aforementioned firearms transaction.

18. Affiant performed a law enforcement query of the telephone number 414-233-[REDACTED]. This query revealed that the number came back as an active number for Kenyon PUGH. Kenyon PUGH provided that particular number to law enforcement as his contact number when he was cited for excessive noise under Milwaukee County Municipal citation number 48923711239. Additionally, Kenyon PUGH provided the contact number of 414-233-[REDACTED] to the Wisconsin Department of Corrections (DOC) on two separate occasions in 2015 as his personal contact number. Kenyon PUGH is prohibited from possessing firearms because he is a convicted felon under Wisconsin Court Case 2011CF002789 for aggravated battery with intent to cause bodily harm, a Class H felony, Wisconsin Court Case 2008CF000265 for receiving stolen property greater than \$10,000, a Class G felony, and Wisconsin Court Case 2005CF006515 for disorderly conduct while armed, a Class B misdemeanor in Wisconsin.

19. Affiant was able to obtain cell phone toll records for the telephone number 414-233-[REDACTED] during the time of the aforementioned firearms transaction. Based on the obtained cell phone toll records obtained by your affiant for the number 414-233-[REDACTED], affiant was able to view several calls and texts that were made between 414-233-[REDACTED] (believed to be Kenyon

PUGH) and 414-216- [REDACTED] ([REDACTED]) on December 6, 2014. Shortly after 414-233- [REDACTED] (Kenyon PUGH) contacted 414-216- [REDACTED] [REDACTED], 414-233- [REDACTED] then contacted the telephone number 414-595- [REDACTED]. Affiant performed a law enforcement query for the telephone number 414-595- [REDACTED] which revealed the number belonged to Antwaun PUGH. Antwan PUGH provided the number of 414-595- [REDACTED] to the Milwaukee County Sheriff's Office on December 8, 2014, as his personal contact number. Toll records revealed that the number listed for [REDACTED] [REDACTED], was contacted by the number listed for Kenyon PUGH. The number for Kenyon PUGH then contacted the number for Antwan PUGH several times before Antwan PUGH met with [REDACTED] to conduct the firearms transaction.

20. Affiant is aware that law enforcement recovered the .45 caliber Glock handgun, bearing serial number XEH452, from J.R. on September 16, 2015. J.R. is a convicted felon prior to this event, and pled guilty to being a Felon in Possession of a Firearm in the Eastern District of Wisconsin.

21. On April 18, 2016, affiant interviewed [REDACTED] [REDACTED] regarding a Glock handgun, model 21, .45 caliber, bearing serial number TNY752. Mr. [REDACTED] indicated that he sold the firearm on "Armslist" on November 9, 2015. Mr. [REDACTED] produced a cell phone bill for his number 301-659- [REDACTED]. Mr. [REDACTED] was able to show that the number he negotiated the firearm deal with was 414-233- [REDACTED] (Kenyon PUGH). Mr. [REDACTED] stated he met the individual at the Park and Ride in Johnsons Creek, WI. Mr. [REDACTED] stated the purchaser of the firearm was the passenger of a Yellow Monte Carlo, a black male, roughly 260-270 pounds with "shaggy" hair. Mr. [REDACTED] observed several photos and identified a MPD booking photo of Antwan PUGH as the individual who possibly purchased the firearm. Mr. [REDACTED] was not certain due to

differing skin tones but could recall the letter D as the middle initial on the person who bought the firearms identification card. Mr. [REDACTED] stated he received around \$400 to \$450 dollars for the firearm. Mr. [REDACTED] stated he believed the vehicle to be an older model Chevrolet Monte Carlo.

22. On December 1, 2015, law enforcement recovered the Glock handgun, model 21, .45 caliber, bearing serial number TNY752, from Antwuan PUGH's residence located at 81 [REDACTED] N. Granville Road, Milwaukee, WI, 53224, as detailed in Paragraph 10 of this affidavit.

23. Affiant interviewed [REDACTED] in regard to three (3) Glock handguns, model 23, .40 caliber, bearing serial numbers MHT876, PVL502, MHZ778, respectively. Mr. [REDACTED] indicated he sold the firearms on "Armslist," on November 15, 2015 to Antwuan PUGH. Mr. [REDACTED] stated that, before he sold the firearms to Antwuan PUGH, he observed Antwuan PUGH'S driver's license, and the photograph on the license matched the individual identifying himself as Antwuan PUGH. Mr. [REDACTED] indicated that he queried Antwuan PUGH in the Wisconsin Circuit Court Access Program (CCAP) and the results revealed that Antwuan PUGH was not a convicted felon in the state of Wisconsin. Mr. [REDACTED] stated that the person who he contacted regarding the firearms transaction utilized the number 414-233-[REDACTED] (Kenyon PUGH). Mr. [REDACTED] had Antwuan PUGH fill out three (3) bills of sale for the firearms. Antwuan PUGH wrote the telephone number 414-233-[REDACTED] on each bill of sale. Mr. [REDACTED] received \$1,250.00 for the three (3) firearms.

24. Affiant was able to obtain telephone toll records for the firearms transaction between Derek [REDACTED] and Antwuan PUGH. Mr. [REDACTED] utilized the telephone number 262-853-[REDACTED]. Records reflect that the telephone number 414-233-[REDACTED] (Kenyon PUGH) sent and

exchanged text messages with Mr. [REDACTED] on November 13, 2015. The next day, November 14, 2015, the telephone number 414-233-[REDACTED] (Kenyon PUGH) called the number 414-793-[REDACTED] several times, and each call appears to have been answered. The telephone number 414-793-[REDACTED] was provided by Antwuan PUGH to MPD on December 1, 2015, as his personal contact number when he was stopped and arrested that same day.

25. The Glock handgun, model 23, .40 caliber, bearing serial number MHT876, was recovered during a traffic stop by MPD on March 1, 2016. Located inside the vehicle officers found a convicted felon and three other individuals, all of whom have suspected ties to narcotics trafficking in the Milwaukee County area. The other two Glock handguns purchased by Antwuan PUGH on November 15, 2015 from Mr. [REDACTED], have yet to be recovered by law enforcement.

26. On August 12, 2016, affiant telephonically interviewed [REDACTED] regarding a SCCY Industries LLC handgun, model CPX-2, 9mm, bearing serial number 105111. Mr. [REDACTED] stated he sold the firearm on "Armslist" to a person with the initial EMAIL address of [REDACTED] (it should be noted Kenyon Pugh was born in 1986). Mr. [REDACTED] stated the two moved to telephone communication from the number 414-233-[REDACTED] (Kenyon PUGH). Mr. [REDACTED] stated he sold the firearm on November 22, 2015. Mr. [REDACTED] could not recall who bought the firearm; however, he did remember the license plate. Mr. [REDACTED] explained the person arrived to the Cabellas in Richfield, WI, in a Yellow Chevrolet Monte Carlo bearing Wisconsin license plate 274-XET. This vehicle is registered to Chaniqua L. BELL. Affiant believes that BELL is a longtime girlfriend of Kenyon PUGH, and Affiant has observed during surveillance her yellow Chevrolet Monte Carlo at the PUGH's residence on Granville Road several times. Mr. [REDACTED] stated he negotiated the transaction from whom he believed to be a male, and a black male and

female arrived to conduct the transaction. Mr. [REDACTED] stated the female handled the paperwork and the firearm, and the black male made some sort of comment that “he was a Glock guy.”

27. Mr. [REDACTED] eventually located a bill of sale for the firearm and provided it to your affiant. The purchaser of the firearm was identified as Chaniqua L. BELL.

28. The firearm sold from Mr. [REDACTED] to BELL was recovered on April 28, 2016, by MPD. The firearm was recovered during the commission of an armed robbery committed by D.D. D.D. subsequently pled guilty to a Hobbs Act robbery, use of a firearm during and in relation to the robbery, and an attempted Hobbs Act robbery in August 2016 in the Eastern District of Wisconsin.

29. On March 22, 2016, affiant interviewed [REDACTED] [REDACTED] regarding a Kahr Arms handgun, model CW-45, bearing serial number SG2977. Mr. [REDACTED] indicated he sold the firearm on “Armslist,” an online firearms brokerage website, in September of 2014.

30. On December 1, 2015, law enforcement recovered the aforementioned firearm box (box only) from Antwuan PUGH’s residence located at 81 [REDACTED] N. Granville Road, Milwaukee, WI, 53224, as detailed in Paragraph 15 of this affidavit.

31. Utilizing the National Integrated Ballistic Information Network (hereinafter referred to as NIBIN), a software used to match shell casings from a crime scene to a particular firearm, MPD was able to match two separate crime scenes to the Kahr Arms handgun. The first incident occurred on February 11, 2015. In this incident, the victim was shot in the neck by the aforementioned firearm and later died from this injury. The second incident occurred on February 15, 2015. In this incident, an unknown actor discharged the aforementioned firearm within one hundred (100) yards of an occupied dwelling within the City of Milwaukee.

32. MPD recovered the Kahr Arms handgun from A.K.D. on April 16, 2015, when he was arrested for carrying a concealed weapon. A.K.D. indicated he purchased the firearm from a person named “Dooky” in Milwaukee around March of 2015. At the time of the firearm’s recovery A.K.D. was not a convicted felon.

33. On April 8, 2016, affiant interviewed [REDACTED] regarding a Glock GMBH handgun, model 22C, .40 caliber, bearing serial number GHU315. [REDACTED] indicated he purchased the firearm in November of 2014. Affiant was able to acquire ATF multiple sale form M20140277848, which revealed [REDACTED] purchased the firearm on November 3, 2014. [REDACTED] indicated he sold the firearm on “Armslist” to an individual he knew to be K.S. on May 7, 2015. [REDACTED] believed K.S. to be an Asian American male.

34. On December 1, 2015, law enforcement recovered the gun box for the Glock GMBH handgun, model 22C, .40 caliber, bearing serial number GHU315, from Antwuan PUGH’s residence located at 81 [REDACTED] N. Granville Road, Milwaukee, WI, 53224, as detailed in Paragraph 10 of this affidavit.

35. Utilizing NIBIN, MPD was able to match the casings from the Glock GMBH handgun, model 22C, .40 caliber, bearing serial number GHU315, to a homicide that occurred in Rockford, Illinois, on December 16, 2015. The victim was a seventeen-year old male.

36. On April 9, 2016, the Glock GMBH handgun, model 22C, .40 caliber, bearing serial number GHU315, was recovered in the City of Milwaukee. Possessing the firearm was D.W. D.W. is a convicted felon. As a result of D.W.’s possession of the Glock, D.W. subsequently pled guilty to being a Felon in Possession of a Firearm.

37. On February 22, 2016, affiant interviewed [REDACTED] regarding a Armscor of the Philippines handgun, model M1911-A1, .45 caliber, bearing serial number RIA1686424. Mr. [REDACTED] indicated he sold the firearm on “Armslist,” sometime in September of 2015. Mr. [REDACTED] stated he saw the exact firearm for sale back on “Armslist” for a higher listed price in October of 2015. Mr. [REDACTED] stated he believed it was the same firearm due to the unique white grips affixed to the firearm. Mr. [REDACTED] could not provide a name for the person to whom he sold the firearm.

38. On November 22, 2015, the aforementioned firearm was believed to be utilized in a shooting that occurred into a house located at 86XX N. 106th St., Milwaukee, WI. At the time of the shooting, witnesses observed a black Lincoln town car speed away from the scene of the shooting. Law enforcement officers know that Antwuan PUGH operates a black Lincoln town car bearing state of Wisconsin license plate 922-XXN, as evidenced by the vehicle stop on December 1, 2015, and as detailed in Paragraph 12 of this Affidavit.

39. On December 1, 2015, law enforcement recovered the Armscor of the Philippines handgun, model M1911-A5, .45 caliber, bearing serial number RIA1686424, in Antwuan PUGH’s bedroom, as detailed in paragraph 11 of this affidavit. This firearm NIBIN tested positive to the shell casings recovered from the scene of the shooting that occurred on November 22, 2015 on 106th Street.

C. Antwuan PUGH’s Post-Arrest Statement and Other Records

40. On December 1, 2015, during Antwuan PUGH’s recorded mirandized statement, Antwuan PUGH stated that the firearms located in the house were in his bedroom and that both firearms in his bedroom were purchased by a girlfriend. Antwuan PUGH stated he bought three (3) or four (4) guns that year and had already sold them. Antwuan PUGH stated he sold a Glock

firearm on the “street” and he did not know the person’s name, Email, or phone number.

Antwuan PUGH further stated that he had the two Glock firearms from the cases in his bedroom, but he sold those as well. Antwuan PUGH stated he has never bought a firearm at a gun store and only off of “Armslist” because it is cheaper.

41. On April 21, 2016, affiant received copies of reported wages from the Wisconsin Department of Workforce Development (DWD) for Antwuan and Kenyon PUGH. The DWD report outlines a person’s reported earnings for any given particular year. In 2015, the PUGH brothers reported earning a combined \$243.86. In November of 2015 alone, Antwuan PUGH spent a combined \$1,700 on four (4) Glock handguns from two different individuals. From December 2014 through November 2015, the PUGHS are suspected of purchasing eleven (11) firearms off of “Armslist,” many of which have been recovered during the commission of crimes throughout the city of Milwaukee.

D. Antwuan and Kenyon PUGH’s Post Search Warrant Activity

42. On March 11, 2016, Kenyon PUGH was a victim of a non-fatal shooting where he was struck in the left calf. The incident occurred at 64 [REDACTED] N. 106th St., Milwaukee, WI. Located at the scene was a white Lexus RX300 bearing state of Wisconsin License plate number 274-XET. A check of the registration revealed that it listed to Regina Pugh (Kenyon and Antwuan PUGH’s mother). Located in the center console of the vehicle was one (1) black 9mm M&P magazine containing four (4) unfired 9mm Aguila cartridges. Recovered from the scene were four (4) spent 9mm Aguila shell casings. Witnesses observed an individual running from the scene where the shooting occurred. This individual jumped into a Yellow, Chevrolet Monte Carlo.

Footage from the hospital where Kenyon PUGH was taken showed Kenyon PUGH being dropped off in a Yellow, Chevrolet Monte Carlo.

43. Kenyon PUGH was interviewed at the hospital regarding this incident. Initially, Kenyon PUGH stated his name was Antwuan PUGH. Kenyon PUGH also stated the shooting occurred at a different address. Recovered inside of Kenyon PUGH's pocket was a key to the Lexus, which was recovered from the scene of the shooting. When investigators confronted Kenyon PUGH regarding the inconsistencies in his statement, he continued to deny any involvement with the white Lexus, and the shooting on 106th Street.

44. Kenyon PUGH was subsequently arrested for a violation of parole order following the shooting. Kenyon PUGH was incarcerated within the Wisconsin Department of Corrections until he was released on February 21, 2017.

45. On July 17, 2016, MPD executed a search warrant at 36XX N. Palmer Street in Milwaukee. MPD recovered several firearms during the course of the search warrant, along with several calibers of ammunition, various gun cases, and holsters. MPD sent the property to their forensic examination division. Item number 9, under MPD inventory number 1602526, is a black and blue FNH gun case with a plastic ziplock bag recovered from inside the case. MPD identified Antwuan PUGH's fingerprints from the plastic bag recovered from inside the gun case.

46. Based upon my training and experience, I know that all the firearms referred to above are not manufactured in Wisconsin and have therefore traveled in interstate commerce in order to reach Wisconsin.

E. Antwuan PUGH's Cell Phone

47. On June 29, 2017, your affiant obtained a federal search warrant signed by the Honorable Magistrate Judge David Jones for one (1) white Samsung touchscreen cell phone bearing serial number 354335/07/551193/3 (Device A). MPD recovered Device A from Antwaun PUGH on December 1, 2015.

48. On July 10, 2017, affiant examined the contents of Device A. The first section examined was entitled "Facebook Chat." Affiant is aware that individuals can utilize "Facebook Messenger" to communicate with other persons who have Facebook accounts. Individuals can utilize "Facebook Messenger" without a wireless connection to their mobile devices. Facebook Members can utilize any wi-fi network to access "Facebook Messenger." Your affiant recognized the Facebook profile "Twez Knockavitch" as a previous Facebook profile for Antwuan PUGH. Affiant viewed pictures for this Facebook profile, and these pictures match an MPD booking photo of Antwuan PUGH.

49. On several posts made by this profile, the user states his/her telephone number is 793- [REDACTED] which is the number that Antwuan PUGH provided to MPD on December 1, 2015, as referenced in Paragraph 19 of this affidavit.

50. Throughout the Facebook chat, the user "Twez Knockavitch" makes several posts regarding narcotics and firearms. For example, between February 29, 2016 and August 20, 2017, the user "Twez Knockavitch" referenced the sale and acquisition of marijuana and ecstasy and sent photographs depicting what appears to be marijuana and ecstasy pills to potential customers. With regard to firearms, between February 16, 2016 and July 26, 2017, the user "Twez Knockavitch" referenced the sale and acquisition of firearms by referring to kinds and

prices of firearms and sent photographs depicting what appears to be firearms to potential customers. Additionally, the profile “Twez Knockavitch” made several references to possessing “heats,” which I know is a common street term for a firearm.

51. Furthermore, on November 23, 2015, the profile “Twez Knockavitch” posted the following comment in a group chat setting: “I shot they ass up the nigga momma don’t want me to hurt him she gave me 375 cause the pulled off wit my pills.” Further in the conversation, this user posts “I gave dude the pills he got in the truck like he was gonna count them instead he pulled off I shot 12 times fuck they van up I turn around they seen me shot once I roll my window down shot my last 3 pulled off made sure I want followed duck my car at Jessie crib call my nigga and he called his mom she paid me.” Affiant believes Antwuan Pugh referred to the shooting that occurred on November 22, 2015, as described in this affidavit.

52. Affiant examined the text message portion of the cell phone. Your affiant observed several messages between Antwuan and Kenyon PUGH, dated November 30, 2015, regarding the sale and trade of firearms, types of firearms, and prices of firearms. Antwuan PUGH sent photos of firearms to Kenyon PUGH as well. Also in November 2015, Antwuan PUGH exchanged several text messages with other individuals who were inquiring about firearms that he had for sale. The subject of these message often included the prices of firearms.

53. Affiant examined the photo portion of the cell phone. Affiant was able to view several pictures of handguns that Antwuan PUGH sent to various individuals. On November 24, 2015, Antwuan PUGH created a photo of what appears to be him holding a model 1911, .45 caliber handgun, the same caliber handgun used in the shooting on November 22, 2015. Your

affiant was able to view several different types of firearms displayed within the contents of Antwuan PUGH's cell phone.

F. Antwuan PUGH's Facebook account "Tywaun Knockavitch"

54. On August 25, 2017, your affiant obtained a federal search warrant for the contents of the Facebook page "Tywaun Knockavitch" with a corresponding Facebook ID of 10011308302732. The warrant was authorized by the Honorable Judge William E. Duffin. Your affiant obtained the results of that warrant on September 27, 2017, the results covered the date of December 1, 2014 through August 25, 2017. Your affiant examined the posts and identified several key conversations that demonstrate narcotics and firearms distribution committed by Antwuan PUGH. For example, on January 18, 2017, "Tywaun Knockavitch" engaged in a conversation with "[REDACTED]" where [REDACTED] requested "130 a half." Your affiant is aware that "half" can often refer to a half ounce of an illegal substance, with "130" referring to the price for half an ounce." In addition, from the date ranges between March 7, 2016 and August 20, 2017 Antwuan PUGH referred to sales and purchases of ecstasy. For example, on April 2, 2017, Antwuan PUGH conversed with "[REDACTED]" who inquired about the price of pills. Antwuan PUGH responded, "5" and sent a picture of pills believed to be ecstasy.

55. Antwuan PUGH also made several references to the acquisition and sale of firearms within his Facebook page from dates ranges February 16, 2016, through July 26, 2017. For instance, between May 21-23, 2017, Antwuan PUGH conversed with "[REDACTED]" regarding the sale/purchase of firearms. Antwuan PUGH sent pictures of the different firearms that were for sale. Antwuan PUGH refers to two of the firearms as "9mm," and your affiant believes the third firearm photograph to be an AK-47.

G. Antwuan PUGH's Facebook account "Twez Knockavitch"

56. In September of 2017, your affiant located the Facebook profile for Antwuan PUGH under the alias "Twez Knockavitch" with a Facebook User ID number of 100013882987756. Affiant observed the photographs of the individual depicted on the profile page and positively identified Antwuan PUGH. The most recent post on the page is a picture of Antwuan PUGH which was posted publicly on October 28, 2017.¹ The picture posted on October 28, 2017, shows Antwuan PUGH holding what appears to be a marijuana cigarette while riding in a vehicle. Your affiant believes this is the same Facebook profile used to discuss the shooting that was previously described previously in this affidavit.

57. On January 22, 2018, your affiant observed the previous Facebook profile "Twez Knockavitch," had been changed to a different name. The name associated with the Facebook page listed as "Deshaun Robinson." Regardless of the name change, your affiant observed the profile picture of this page and the photo of Antwuan PUGH remained as the profile picture. Your affiant is aware that the process to change one's name on Facebook is as simple as clicking on "settings" and then "edit name." Your affiant checked the URL and Facebook ID for the page "Deshaun Robinson." The URL and Facebook ID are identical for the previous page "Twez Knockavitch" and the current profile page "Deshaun Robinson."

58. On January 22, 2018, your affiant obtained a federal search warrant for the contents of the Facebook page "Twez Knockavitch" with a corresponding Facebook ID of

¹ The former Facebook profile for "Twez Knockavitch" and current profile "Deshaun Robinson" are not open to the public.

100013882987756. The warrant was authorized by the Honorable Judge William E. Duffin. Your affiant examined the contents of the Facebook report provided by Facebook on February 12, 2018. The following posts were located within the contents of the Facebook page “Twez Knockavitch:” On July 9, 2017, the profile “Dashaun Robinson” provided “[REDACTED]” with the phone number for Antwuan PUGH stating, “I don’t be on this page call me when u get a chance.” In October 2017, on this page conversations occurred between Antwuan PUGH and others regarding the sale of a firearm and marijuana.

H. Antwuan PUGH’s Facebook Account “Tywaun Knockavitch” (Re-filed on May 30, 2018)

59. On May 30, 2018, your obtained a federal warrant for updated content on the Facebook page “Tywaun Knockavitch.” The contents of the Facebook report provided from Facebook, Inc. covered the date range of August 25, 2017 through May 30, 2018. A review of these contents revealed that Antwaun PUGH has continued to traffic in illegal substances and firearms.

60. On May 30, 2018, “Tywaun Knockavitch” and “[REDACTED]” discussed “[REDACTED]” purchase of pills from Antwuan PUGH. In this conversation, Antwuan PUGH also attached a picture of the pill bottle, and at one point indicated that he also needed to contact Antwuan PUGH’s brother, “You hit bro.” Throughout the chats, with different individuals, continued to have conversations regarding the sale of pills.

61. On May 24, 2018, the profile “Tywaun Knockavitch” posted a photograph of a state of WI identification card for Antwaun PUGH, with the address listed at 82 [REDACTED] N. 107th St.,

Apt. # 205, Milwaukee, WI, 53224.



62. On May 12, 2018, in a chat between “Tywaun Knockavitch” and “[REDACTED]”, “Tywaun Knockavitch displayed a photograph of a firearm. Based upon the chat, your affiant believes that Antwaun PUGH traded pills for the firearm stating, “Just got it from my nigga I gave his all the pills...”

Tywaun Knockavitch: (Sent photo)



63. Between the dates of September 8, 2017, and April 22, 2018, the profile page “Tywaun Knockavitch” on six separate occasions provided the address “82 [REDACTED] n 107” to various Facebook users when providing directions to them. Your affiant believes this further corroborates that Antwaun PUGH resides at 82 [REDACTED] N. 107th St., # Apt. [REDACTED], Milwaukee, WI, 53224.

I. Kenyon PUGH’s Facebook account search warrant for the page “Keyon Quintel”

64. Your affiant obtained a Facebook search warrant for the page “Keyon Quintel” on July 12, 2018. The warrant was authorized by the Honorable Judge William E. Duffin. Your affiant had compared photographs on the page to a Milwaukee Police Department booking photograph of Kenyon PUGH and the two appear identical.

65. Your affiant reviewed the contents of the Facebook page and observed several Facebook messages related to the sale and acquisition of prescription narcotics from Kenyon PUGH. These posts occurred between the dates of October 6, 2017 and July 12, 2018. In this date range there are approximately 15 messages related to Kenyon PUGH’s attempts to purchase prescription pills. The following conversations are examples of the messages stated by Kenyon PUGH. For example, on May 26, 2018, “[REDACTED]” informed “Keyon Quintel” that “White 20 s perks n tramadol are around if u need em.”

66. In addition to the messages related to the prescription narcotics, your affiant has observed photographs and conversations related to firearms on the Facebook page “Keyon Quintel.” Kenyon PUGH is a convicted felon and is prohibited from possessing firearms. On January 12, 2018, the profile “Keyon Quintel” sent two separate photos of two different apparent

firearms to another Facebook user. A conversation then ensued regarding the price of those firearms.

67. Throughout the Facebook messages, Kenyon PUGH utilized the page “Keyon Quintel” to provide his address to various individuals. Between June 12, 2017 and April 26, 2018, on six (6) separate occasions when asked for his address “Keyon Quintel” provided “39 [REDACTED] W Good Hope Rd.”

J. Controlled Purchase of prescription narcotics from Kenyon PUGH

68. On August 17, 2018, your affiant participated in a controlled purchase of prescription narcotics from Kenyon PUGH. A controlled purchase is an operation conducted by law enforcement, the confidential source (CS) is searched prior to the operation so that no illegal contraband can be introduced during the purchase. The CS is then provided money for the purchase which will be used to obtain the illegal contraband (drugs, firearms etc.). After purchase, the item will be handed them over to law enforcement. The CS is then searched once more for contraband.

69. On August 17, 2018, a CS and an undercover agent drove to the area of N. 107th St., and W. Brown Deer Rd., in Milwaukee County.² The CS met with Kenyon PUGH who instructed the CS to meet him at a certain area. Kenyon PUGH indicated to the CS he needed to obtain the pills, but that he would return and meet the CS. At this point in time, your affiant

² I believe that the CS is truthful and reliable because the CS has made statements against the CS’ penal interest. In addition, the CS’ information was corroborated by other evidence developed during the course of this investigation. The CS was working with law enforcement as a result of a municipal paraphernalia charge. The CS has previous convictions for narcotic drugs; bail jumping; disorderly conduct (domestic abuse); and possession of heroin.

observed Kenyon PUGH pull into the parking lot of 82[REDACTED] N. 107th St., Apt. # [REDACTED], Milwaukee, WI, and park the Green Infiniti SUV (WI Tag NV8477) he was driving. Kenyon PUGH and an unidentified black female exited the vehicle and entered the common door that leads to Apt. # 205. Kenyon PUGH and the black female emerged from the residence approximately two minutes later and drove back to meet the CS and the undercover agent. The CS provided Kenyon PUGH the money and obtained 28 suspected hydrocodone/acetaminophen pills (10 mg/325mg each), 21 suspected alprazolam pills (2 mg each), and 3 suspected oxycodone hydrochloride pills (30 mg each) which the CS turned over to law enforcement officers.

70. After the transaction occurred, the same Green Infiniti SUV previously driven by Kenyon PUGH returned to 82[REDACTED] N. 107th St., Milwaukee, WI, and the same black female exited the vehicle and entered into the common door that leads to Apt. # 2[REDACTED]. The black female soon exited the residence and the Green Infiniti exited the parking lot and drove out of sight.

IV. RESIDENCES

71. Based upon the foregoing, affiant believes that Antwaun PUGH resides at 82[REDACTED] N. 107th St., Milwaukee, WI, 53224: (1) PUGH uses this address as his residence on his state of WI identification card; (2) on December 19, 2017, January 2, 2018, February 8, 2018, June 22, 2018, and on August 20, 2018 your affiant observed Antwaun PUGH coming to and from the aforementioned residence; (3) Antwaun PUGH provided the aforementioned address to Facebook users on six separate occasions between the dates September 8, 2017, and April 22, 2018; (4) my review of a WE Energies grand jury subpoena revealed that Antwaun PUGH had an open account with WE Energies for the aforementioned address in May of 2018 (most recent

information from WE). In addition, Affiant believes that Kenyon PUGH has free access to 82 [REDACTED] N. 107th St., Apt. # [REDACTED] Milwaukee, WI, 53224.

72. Affiant believes that Kenyon PUGH resides at 39 [REDACTED] W. Good Hope Rd., Apt # [REDACTED] Milwaukee, WI, 53209: because: (1) Kenyon PUGH uses this address on his State of Wisconsin driver's license; (2) State of Wisconsin Department of Corrections probation agents conducted a residence check for Kenyon PUGH at 39 [REDACTED] W. Good Hope Rd., Apt. # [REDACTED], Milwaukee, WI, 53209, on July 12, 2018 to verify his address; (3) Affiant has observed a Black Mazda CX-9 associated with Chaniqua L. BELL (B/F, DOB: [REDACTED]/1989) at the residence on July 17, 2018, and again on August 20, 2018. BELL is the longtime suspected girlfriend of Kenyon PUGH; (4) In the Facebook page "Keyon Quintel" Kenyon PUGH provided the address of "39 [REDACTED] W Good Hope Rd" to various individuals on approximately six separate occasions between the dates of June 12, 2017 and April 26, 2018; and, (5) on August 20, 2018, affiant observed the same Green Infiniti SUV with WI tag NV8477 (vehicle utilized for the controlled delivery) parked in the rear parking lot of 39 [REDACTED] W. Good Hope Rd., Apt. # [REDACTED] Milwaukee, WI, 53209, at approximately 6:30 p.m.

73. Affiant is also requesting to search all vehicles under apparent control of Antwaun and Kenyon PUGH. This is to include keys located inside the residence that are linked to vehicles in the parking lot controlled by the PUGH brothers. Affiant is aware that many vehicles previously linked to the PUGH's (affiant's own observations) are registered to the address located at 82 [REDACTED] N. 107th St, Milwaukee, WI, 53224, in the name of Regina Ann PUGH (mother of Antwuan and Kenyon PUGH). Affiant makes this request, in part, because Kenyon

PUGH used the Green Inifiti (WI Tag NV8477) to conduct a narcotics transaction. That vehicle is registered to Regina PUGH at 82 [REDACTED] N. 107th St., Apt. # [REDACTED] Milwaukee, WI, 53224.

74. Affiant is also requesting the warrant be served in a “no knock” manner. Affiant has observed on many occasions the propensity for the PUGH brothers to have access to firearms. Affiant is aware that a “no knock” style warrant gives the occupants of a residence little time to arm themselves thus making the warrant execution safer for law enforcement.

V. CONCLUSION

75. Based upon my training, experience, and familiarity with the investigation, affiant believes that Antwuan PUGH and Kenyon PUGH utilized multiple modes of electronic communication to conduct firearms and drug transactions. Affiant believes, based upon such records and information, as detailed herein, that Kenyon PUGH, a previously convicted felon, organized several firearms transactions via “Armslist,” and then used his brother, Antwuan PUGH, a non felon, to conduct the actual transaction with the seller of the firearm. Affiant believes that Antwuan PUGH was actively engaged in the distribution of firearms along with his brother Kenyon PUGH.

76. Affiant is aware that someone who purchases firearms on behalf of a prohibited person is called a “straw purchaser.” The straw purchaser conducts the transaction so as to not be detected by law enforcement. The straw purchaser then distributes the firearm or firearms accordingly to other individuals who are often prohibited from lawfully possessing firearms. Affiant reasonably believes that Antwuan PUGH was acting as a straw purchaser for his brother Kenyon PUGH. Affiant believes that records of these transactions, are stored at Antwaun

PUGH's residence located at 82[REDACTED] N. 107th St., Apt. # [REDACTED], Milwaukee, WI, 53224, and Kenyon PUGH's residence located at 39[REDACTED] W. Good Hope Rd., Apt. # [REDACTED], Milwaukee, WI, 53209.

77. The above examples of conversations, reports, and cell phone forensic examination have led your affiant to believe that Antwuan and Kenyon PUGH are involved in the illegal purchase and distribution of firearms in addition to the sale of controlled substances. I respectfully request that the aforementioned residences be searched for the following crimes; (1) possession of a firearm by a prohibited person in violation of Title 18, United States Code, Section 922(g)(3); (2) possession of a firearm by a felon in violation of Title 18, United States Code, Section 922(g)(1); (3) and selling or disposing of any firearm or ammunition to a known felon, in violation of Title 18, United States Code, Section 922(d)(1); (4) dealing firearms without a license, in violation of Title 18 United States Code, Section 922(a)(1); and (5) possession with intent to distribution controlled substances in violation of Title 18, United States Code, Section 841(a)(1).